

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

PINNACLE PACKAGING COMPANY,)
INC., an Oklahoma corporation,)
POLO ROAD LEASING, LLC, an Okla-)
homa limited liability company, and)
J. SCOTT DICKMAN,)

Plaintiffs,)

vs.)

Case No. 12-CV-537-JED-TLW

CONSTANTIA FLEXIBLES GmbH, an)
Austrian corporation, and)
ONE EQUITY PARTNERS (EUROPE) GmbH,)

Defendants.)

**SUPPLEMENT TO
MOTION OF PLAINTIFFS TO APPLY CRIME FRAUD EXCEPTION
TO CLAIMS OF PRIVILEGE BY DEFENDANTS AND FOR
OTHER RELIEF ON CLAIMS OF PRIVILEGE**

Plaintiffs, Pinnacle Packaging Company, Inc. (“Pinnacle”), Polo Road Leasing, LLC (“Polo Road”), and J. Scott Dickman (“Dickman”) (collectively, “Plaintiffs”), hereby supplement their *Motion of Plaintiffs to Apply Crime Fraud Exception To Claims of Privilege by Defendants and for Other Relief on Claims of Privilege*, filed August 7, 2015 [DKT 135], as follows:

Attached hereto is the executed copy of the Affidavit of Thomas Blaige, that is Exhibit 60, referenced therein.

s/ Laurence L. Pinkerton

Laurence L. Pinkerton, Esq. (OBA #7168)

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2015, I electronically transmitted the foregoing pleading, to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

John D. Russell, Esq.
GABLEGOTWALS
1100 ONEOK Plaza
100 West Fifth Street
Tulsa, Oklahoma 74103-4217

Cheryl Howard, Esq.
Aaron Lang, Esq.
Marshall Fishman, Esq.
FRESHFIELDS BRUCKHAUS DERINGER US LLP
601 Lexington Ave., 31st Floor
New York, NY 10022

s/ Laurence L. Pinkerton

EXHIBIT 60

AFFIDAVIT OF THOMAS BLAIGE

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK.)

On this date Thomas Blaige personally appeared before me, the undersigned Notary Public, and after being duly sworn, stated the following under oath:

1. My name is Thomas Blaige. I am over the age of twenty-one years, of sound mind, and fully competent to testify to the matters set forth herein. I have personal knowledge of the statements contained herein, and they are true and correct.

2. Thomas Blaige & Company has produced to Plaintiff's pursuant to a Subpoena issued in *Pinnacle v. Constantia*, Case No. 12-CV-537-JED-TLW, in the United States District Court for the Northern District of Oklahoma, specific documents numbered BLAIGE0000864-0000865, BLAIGE0000884-0000885, BLAIGE0000898-0000900, BLAIGE0000909, BLAIGE0000910, BLAIGE0000923-0000924, BLAIGE0000952-0000955, BLAIGE0001179-0001180, BLAIGE0001181-0001182, BLAIGE0001183, BLAIGE0001189-0001190, BLAIGE0001216-BLAIGE0001217, BLAIGE0001224-0001226, BLAIGE0001227-0001229, BLAIGE0001253-BLAIGE0001254, BLAIGE0001351-0001369, BLAIGE0001382, BLAIGE0001936-0001938, BLAIGE0002051-0002052, BLAIGE0002071-0002078, BLAIGE0002112-0002120, BLAIGE0002121. I represent that those documents are true copies of records kept at Thomas Blaige & Company. It is the practice of Thomas Blaige & Company to make documents or records, and these documents or records were made at or near the time expressed thereon by someone with knowledge. Where my name is shown as the author of an email, I am the author. These documents and records have been kept in Thomas Blaige & Company's files and on Thomas Blaige & Company's servers in the course of regularly conducted activity of Thomas Blaige & Company.

3. My role within Thomas Blaige & Company is sufficient to enable me to make these representations.

FURTHER AFFIANT SAYETH NOT.


Thomas Blaige

A handwritten signature in black ink, appearing to read 'T. Blaige', is written over a horizontal line.

Subscribed and sworn to before me on this 27 day of August, 2015.

My commission expires:

6/12/2018


NOTARY PUBLIC
Matthew Creelman
COMMISSION # FF132134
EXPIRES: JUN 12, 2018
BONDED THRU
1st FLORIDA NOTARY, LLC